## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF OKLAHOMA

JAMES GLITZ and RODGER A. THORNBERRY, on behalf of themselves and all others similarly situated,	) ) )
Plaintiff,	<b>)</b>
v.	
SANDRIDGE ENERGY, INC., TOM L. WARD, JAMES D. BENNETT, and MATTHEW K. GRUBB	Case No. CIV-12-1341-W
Defendants.	)
	) )

# JOINT MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S COMPLAINT AND SCHEDULING ORDER

Whereas Plaintiffs James Glitz and Rodger Thornberry (the "Glitz Plaintiffs") filed their complaint in Case No. CIV-12-1341-W in this Court on December 5, 2012 alleging certain violations of the federal securities laws against SandRidge Energy, Inc., Tom L. Ward, James D. Bennett, and Matthew K. Grubb (collectively "Defendants");

Whereas Plaintiff Louis Carbone ("Carbone") filed his complaint in Case No. CIV-13-0019-W in this Court on January 4, 2013 against the same Defendants alleging similar violations of the federal securities laws. An identical version of this motion has been filed simultaneously in the Carbone case;

Whereas the Private Securities Litigation Reform Act (15 USC § 78u-4) provides for the appointment of a lead plaintiff in putative securities class actions including the Glitz and Carbone actions;

Whereas on February 4, 2013, several members of the putative class filed motions seeking their appointment as lead plaintiff and approval of their selection of lead counsel over both the Glitz and Carbone actions and a motion to consolidate the Glitz and Carbone actions;

Whereas the Court-appointed lead plaintiff intends to file a consolidated amended complaint following such appointment; and

Whereas the Glitz and Carbone Plaintiffs and the Defendants (collectively, the "Parties") have agreed to extend the Defendants' time to answer or otherwise respond in each case until after a lead plaintiff is appointed and a consolidated amended complaint is filed;

Now, therefore, the Parties jointly move the Court to stay Defendants obligation to respond to the existing complaints and to set the following schedule for the filing of a consolidated amended complaint and pleadings or motions responsive thereto:

- 1. Within 45 days of entry of the Order appointing lead plaintiff, the lead plaintiff will file a consolidated amended complaint.
- 2. Defendants will have 45 days after the filing of the consolidated amended complaint to file a motion to dismiss or other responsive pleading.
- 3. Plaintiffs will have 45 days after the filing of the motion to dismiss, if one is filed, in which to file their opposition.
- 4. Defendants will have 30 days after the filing of the opposition papers in which to file their reply, if any.

- 5. In light of the anticipated filing of a consolidated amended complaint, Defendants shall have no obligation to answer or move in response to the existing complaints filed in the Glitz and Carbone actions.
- 6. This represents the first request for an extension of time for any of the Defendants to respond to the complaint in either captioned case. This request will not impact the trial date or any other deadline in this case as no other deadlines have been set.
  - 7. A proposed order is filed concurrently herewith.

WHEREFORE, the Parties respectfully request that the Court enter an order setting the above briefing schedule governing both of the above captioned cases.

Respectfully submitted,

s/Thomas B. Snyder

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### s/Darren B. Derryberry

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#### **CERTIFICATE OF SERVICE**

I hereby certify that on this 6th day of February, 2013, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

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